



Horatio Public Schools

Office of Superintendent
PO Box 435, Horatio, Arkansas 71842 • (870) 832-1940 • Fax (870) 832-4465
www.horatioschools.org

December 13, 2016

To Whom It May Concern:

The Horatio School District is seeking a rule waiver from the FCC in order to reverse USAC's denial of our **470/471 Horatio Public Schools MAN Solution #160034537 - #161047360**. The reasons for the denial result from human error brought about by urgent and unforeseeable circumstances. We have developed a timeline to enhance your understanding of our situation. We hope for a decision that is in the best interest of our students' and staff's needs.

January 2016 - March 2016

Horatio School's e-rate consultant became ill with cancer but assured us of his availability to assist with our e-rate applications. His condition worsened to the point that he could not speak; therefore, we consulted via email. His condition deteriorated even further and his communication became less timely and helpful. This disrupted the district's planning a great deal as our loyalty to a 20+ year partner conflicted with a looming deadline. Communication with the consultant became less and less frequent. Finally, with deadlines drawing near, the district's administration solicited assistance from our educational service cooperative. Seeking another consultant was out of the question because of the closeness of the filing deadline.

March 2016

The district engaged the assistance of our educational services cooperative's IT specialist for the development of IT solutions and e-rate applications. The specialist had no prior e-rate filing experience but participated in e-rate "crash courses" to learn the new filing system. The training was not formal, it came from specialists in other school districts with e-rate experience. He came away from his training with an understanding that the district had a 30 day window for 470 filing from start to finish. This was the nature of our error. This resulted in an aggressive and detailed RFP. Due to the aggressiveness of the RFP, the IT specialist was able to obtain all supporting documents and bids from 5 vendors.

The original RFP was prepared on March 8, 2016 with a submission deadline of April 1, 2016, so we could review proposals on April 4, 2016. This timeline matched our understanding of the 30 day window. We received a notification from one vendor of a typo in our RFP regarding our deadline date. We sent notification to all vendors, via email, of the typo with correction of our deadline date. Around this same time, the superintendent was notified by USAC that the 470 was not submitted properly and that we were

The logo for Horatio Public Schools features a stylized, large letter 'H' in the background. The 'H' is composed of two main vertical bars and a horizontal crossbar, all rendered in a light blue color with a white outline. Overlaid on the center of the 'H' is a red lightning bolt. The lightning bolt is also stylized, with a white outline and a red fill. The entire logo is centered at the top of the page.

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unable to submit changes to a submitted 470. Therefore, a new 470 was submitted on March 10, 2016, per USAC instructions. We were told that we could use the same RFP but were not instructed to change the dates. We proactively reached out to all vendors notifying them of the situation and that a new 470 had been created. We provided all of them with a new 470 number. Since we notified the vendors of every change and USAC said we could use the same RFP, we did not amend our RFP dates.

April 2016

We reviewed all of the submitted bids and developed a matrix to use for comparisons from which vendor selection was made. We considered all costs, including maintenance and equipment, over a 10 year period and made recommendation to the board of our decision. The board accepted our recommendation due to the considerable cost savings over short and long periods of time.

May 2016 - October 2016

The district was able to address every question and concern brought forth by USAC during the evaluation process. We provided bid information, detailed quotes, decision matrices, and justifications related to our final solution and vendor selection. During this process, USAC made us aware that the reasons for denial was due to the non-adherence to the competitive bidding time allotment.

Other issues and concerns resulting from this denial

Our state has expanded our broadband to 250 mbps at no cost for the initial connection to our high school. However, it is incumbent upon the district to connect other campuses to the high school and take full advantage of the generous bandwidth the state has provided. The application denied was our solution to connect the elementary campus and the administration office to the district network centrally located at the high school. Also, the request for self-provisioned fiber is a significant cost savings to taxpayers of the district and state, as well as future scalability and connection speeds. This denial has caused us to seek MAN solutions through vendors who charge exorbitant equipment rental fees that are paid for with tax dollars, and require extended period contracts. Furthermore, it has caused a major disruption to other technology plans that will enhance faculty and students' experiences.

Our district rolled out a 1:1 iPad Pro initiative for grades 7 through 12. We did this to level the playing field for our disadvantaged population. (We are 73% free and reduced lunch population, K-12). We also anticipated that our technology plans would be in place by the time of the roll out and our e-rate funding would be available to support it. Our MAN solution, which was denied, will enable us to transition unnecessary learning technology equipment (iPads, Chromebooks, etc.) as well as switching and wireless



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equipment to our elementary students and create an entirely 1:1 environment on both campuses. USAC's denial has prevented us from connecting our elementary to the expanded bandwidth. The current bandwidth, network infrastructure, and vendor provided MAN would not support that many devices at the elementary.

Summary

We feel that USAC's denial is unwarranted because: 1) the district was put into a disadvantage due to the loss of an experienced e-rate consultant; 2) the misinterpretation of timeline information by our IT specialist; 3) the district took proactive measures to ensure all rules were followed so that no loss of funding would occur; and 4) there was no malfeasance in our actions, only human error while looking out for the best interest of our students and staff.

The denial of **Horatio Public Schools MAN Solution #160034537 - #161047360** has hindered student access to learning resources among a student population that is already disadvantaged. Please grant us this waiver so we may move forward with our plan.

Sincerely,



Lee Smith, Superintendent
Horatio Public Schools